

[REDACTED]

From: Debbie Carruthers [REDACTED]
Sent: Tuesday, 26 January 2021 10:59 PM
To: Fingerboards Inquiry and Advisory Committee (DELWP)
Cc: Carruthers Debbie
Subject: Document 25
Attachments: IAC Direction 26 Response.docx

[REDACTED]

[REDACTED]

EXTERNAL SENDER: Links and attachments may be unsafe.

Hi Amy

I have had a close look at Document 25 which Kalbar was directed to prepare (Direction 26). I have reviewed this against the two submissions that I submitted (#765 and #814) and found there were a number of omissions, either the submission number wasn't mentioned or there are issues I believe should have been included. I have included page and paragraph references for verification purposes.

in the attached document I have provided those amendments, including advice about those changes and request that they be forwarded to Kalbar for inclusion in an amended Document 25. Where a new issue is added, potentially other submissions should be checked to see if that issue was also raised by other people.

Thanks very much for your assistance with this.

Kind regards

Debbie
[REDACTED]

Fingerboards Mineral Sands Project Environment Effects Statement

Inquiry and Advisory Committee Direction No. 26 — EES submissions summary

This document provides the following information:

- *Additional submission numbers that should have been included for identified issues (page and paragraph references have been provided for verification purposes).*
- *Issues that weren't identified to request they be included with submission numbers (page and paragraph references provided for verification purposes).*
- *Additional dot points or amendments are provided, to be added to issue descriptions.*
- *A typing error in issue numbering under 'Noise', the last issue is '6' not '4'.*

It is requested that Document 26 be amended in light of the above and resubmitted as an amended document. Where a new issue is included, potentially other submissions should be checked to see if that issue was also raised.

2.1 General

Issue 12. Add submission #765 (refer page 2, 2nd last paragraph)

Issue 23. Add submission #814 (refer page 5, paragraph 4)

2.2 Biodiversity

Issue 3. Add submission #765 (refer page 4, 3rd last paragraph)

Issue 6. Add submission #814 (refer page 7, paragraph 3)

New Issue- needs an issue #: Concern that field surveys were not conducted on 1,099 hectares of private land that is outside the Project boundary and is part of the PSA.

Add submission #814 (refer page 7, paragraph 3)

2.3 Groundwater

Issue 1. Add submission #765 (refer page 4, 2nd last paragraph)

Issue 3. Add submission #765 (refer page 3, last paragraph)

Issue 6. Add submission #765 (refer page 4, 3rd last paragraph)

Issue 6. Add submission #814 (refer page 5, 1st and 3rd paragraph)

New Issue- needs an issue #: Concern about aquifer interference.

Submission #765 (refer page 4, 2nd last paragraph)

Submission #814 (refer page 5, paragraph 2)

2.4 Water catchment

Issue 2. Add submission #765 (refer page 3, last paragraph)

Issue 5. Add submission #765 (refer page 3, 2nd last paragraph)

Issue 6. Add submission #765 (refer page 3, last paragraph and page 4, 1st sentence)

New Issue- needs an issue #: Concern about how the catchment dams are proposed to be decommissioned and have these costs been included in the rehabilitation bond calculation.

Submission #814 (refer page 5, 2nd dot point)

New Issue- needs an issue #: Comment that SRW has indicated in correspondence that interaction of the aquifers and the river is not well understood. As problems were experienced by bore users when tests were conducted on the bore field there is concern that farmers may not have access to bore water which for some is their only source of water.

Submission #814 (refer page 6, 1st paragraph after dot point)

2.6 Water supply

Issue 1: Request that the following dot points be added under the issue description column:

- Concerns by farmers who have no access to other water sources other than from their aquifer that it will become contaminated, that there will be aquifer interference and that their ability to draw water will be impacted due to the high volumes of water the mine requires.
(refer Submission #765, page 4, 2nd last paragraph – the submission number is included however I believe the above issue should be added to the issue description)
- Concern that any impact on farmers access to clean water will have significant detrimental consequences to their farming businesses and livelihoods.
(refer Submission #765, page 4, 2nd last paragraph – the submission number is included however I believe the above issue should be added to the issue description)

Issue 2. Add submission #814 (refer page 3, last sentence which continues on page 4)

Issue 3. Add submission #814 (refer page 4, several paragraphs)

Issue 3. Request that the following dot point be added under the issue description column:

- Importance of environmental flows for the Mitchell River and Gippsland Lakes Ramsar site.
(refer Submission #814, page 4, paragraph before the dot points)

Issue 4. Add submission #814 (refer page 4, 2nd and 3rd dot points)

Issue 5. Add submission #814 (refer page 4, 3rd last dot point)

2.7 Air quality

Issue 4. Add submission #765 (refer page 3, paragraph 1)

Issue 6. Add submission #765 (refer page 6, paragraph 3)

Issue 6. Add submission #814 (refer page 2, paragraph 2)

Issue 7. Add submission #765 (refer page 3, 4th and 5th paragraph)

Issue 7. Add submission #814 (refer page 3, paragraph 5)

New Issue- needs an issue #: Concern that toxicity of the ore body has not been reported so the full dangers have not been disclosed.

Add submission #765 (refer page 3, paragraph 2)

Add submission #814 (refer page 3, paragraph 3)

New Issue- needs an issue #: Concern that evidence of the chain of custody of the samples was not provided so the sample results must also be questioned.

Add submission #814 (refer page 3, paragraph 3)

2.9 Noise

Issue 2. Add submission #765 (refer page 2, 2nd last paragraph)

Issue 2. Add submission #814 (refer page 7, last paragraph)

Typing error: There are two Issue '4's' - the last one should be issue 6 not 4

2.10 Radiation/Heavy Metals

Issue 4. Add submission #814 (refer page 3, paragraph 4)

2.12 Horticulture/agriculture

Issue 5. Add submission #765 (refer page 4, paragraph 2 of section 5)

Issue 5. Add submission #814 (refer page 4, paragraph 2)

New Issue- needs an issue #: Comment that agriculture creates 4 times more indirect jobs than mining. Every job lost in agriculture has a 4 times multiplier flow-on loss effect which will have a major impact on the local economy.
Add submission #765 (refer page 2, last paragraph)

2.14 Socioeconomic

Issue 2. Add submission #765 (refer page 2, last paragraph)

Issue 7. Add submission #765 (refer page 2, last paragraph)

Issue 7: Request that the following dot point is added under the issue description column:

- Every job created/lost in agriculture has a 4 times multiplier creation/loss effect on jobs (refer Submission #765, page 2, last paragraph)

Issue 9. Add submission #814 (refer page 7, last dot point)

New Issue- needs an issue #: Concern that Project is putting the livelihood of farmers and horticulture business owners at risk.

Add submission #765 (refer page 2, 2nd last paragraph)

Add submission #814 (refer page 8, paragraph 2)

2.15 Human health

Issue 7. In 'Issue description' add the word 'soils,' after 'plants' and add the words 'into the food chain' after 'products'.

Add submission #765 (refer to page 3, 1st paragraph)

New Issue- needs an issue #: Concern that the impact of dust, noise, vibration and lights from a 24 hour/day 7 day/week operation was not assessed for all sensitive receptors because Kalbar failed to identify all of them.

Add submission #765 (refer page 2, 2nd last paragraph)

Add submission #814 (refer page 7, last paragraph)

2.16 Rehabilitation

Issue 5. Add submission #814 (refer page 10, 1st paragraph)

2.17 Community engagement

Issue 1. Add submission #765 (refer page 7, 2nd paragraph)

Issue 3. Add submission #765 (refer page 7, Section 10)

New Issue- needs an issue #: Claim it will be very difficult or potentially impossible for any of the mitigation strategies to be implemented that rely on the importance of open communication and community-driven solutions to problems that will arise as there is no trust with Kalbar.

Add submission #765 (refer page 7, paragraph 3)

Add submission #814 (refer page 1, 3rd last paragraph)

2.19 Planning and planning scheme amendment (PSA)

New Issue- needs an issue #: Concern there was no consultation with the community about the PSA.

Add submission #814 (refer page 10, paragraph 3)

New Issue- needs an issue #: Comment that given the massive scale of the Project area at over 16 square kilometres the infrastructure and pipelines should be confined to the project area.

Add submission #765 (refer page 6, last paragraph)

Add submission #814 (refer page 10, paragraph 5)

New Issue- needs an issue #: Concern this is not a project of state significance there are other locations where these products are being mined so PSA must be declined.

Add submission #765 (refer page 6, last paragraph)

Add submission #814 (refer page 10, paragraph 4)

New Issue- needs an issue #: Concern that field surveys were not conducted on 1,099 hectares of private land that is outside the Project boundary and is part of the PSA.

Add submission #814 (refer page 7, paragraph 3)

2.20 Tailings management

Issue 3. Add submission #765 (refer page 3, last paragraph which continues on page 4)

Issue 3. Add submission #814 (refer page 6, 2nd dot point under Section 6)

Issue 4. Add submission #765 (refer page 3, 2nd last paragraph)

Issue 4. Add submission #814 (refer page 6, 1st dot point under Section 6)

New Issue- needs an issue #: Concern that if there is a flooding event, tailings waste and flocculants will be released into creeks/ivers, harming aquatic life, aquifers and the unique Chain of Ponds.

Add submission #765 (refer page 3, last paragraph that continues on page 4)

Add submission #814 (refer page 6, 5th dot point under Section 6)

New Issue- needs an issue #: Concern that soils in the area are dispersive with tunnel erosion an unresolved problem. Concern of TSF failure due to unstable soil resulting in toxic materials entering the river, aquifers and wetlands.

Add submission #814 (refer page 6, second last dot point)

2.22 EES Process

Issue 2. Add submission #765 (refer page 3, paragraph 2)

Issue 3. Add submission #765 (refer page 6, paragraph 2)

Issue 3. Add submission #814 (refer page 2, 1st paragraph)

Issue 9. Add submission #765 (refer page 6, 4th paragraph)

New Issue- needs an issue #: Concern that mitigation strategies must be considered inadequate due to flaws in the EES and the disclaimer by Coffey.

Add submission #765 (refer page 6, 2nd last paragraph)

Add submission #814 (refer page 2, paragraph 4)